



John MacDonald, Partner & Office Head  
Cybersecurity & Data Privacy Team  
3120 Princeton Pike, Suite 301  
Lawrenceville, NJ 08648  
jmacdonald@constangy.com  
609.454.0096

July 11, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corporation, et al v. Restoration of America., et al.***  
**Case No. 1:24-cv-04324-HB**  
**Defendants' Motion to Dismiss Plaintiffs' Complaint**

Dear Judge Bartle:

This firm represents the defendants Restoration of America and Voter Reference Foundation LLC ("Defendants") in the above-referenced matters. Defendant's Reply to the Motion to Dismiss is due on Monday, July 14, 2025. There has been an unexpected absence of the client's team and are therefore requesting a four (4) day extension to filing the Reply to Plaintiffs' Opposition to the Motion to Dismiss, or until Friday, July 18, 2025. Plaintiffs' counsel has courteously consented to this proposed extension.

Respectfully submitted,

*/s/ John E. MacDonald*

John E. MacDonald  
Partner & Office Head, Cybersecurity & Data Privacy Team